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September 29, 2017

**VIA ECF**

Honorable Shelley C. Chapman  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Chambers Room 632  
New York, New York 10004

Re: Hello Newman, Inc., Debtor  
Chapter 11 Case No. 16-12910 (SCC)  
vs. Doris Kornish  
Adv. Pro. No. 17-01067 (SCC)

Dear Judge Chapman:

We are the attorneys for Albert Togut, the Chapter 11 Trustee of the above-referenced Debtor, and the plaintiff in the above-referenced adversary proceeding.

On August 18, 2017, Your Honor entered *Findings of Fact and Conclusions of Law* [Adv. Pro. Dkt. No. 33] and the *Order Granting Judgment* [Adv. Pro. Dkt. No. 34] in the above-captioned adversary proceeding which direct that, among other things, “on or before September 28, 2017, [Doris] Kornish shall vacate the Real Property [located at 113 East 2<sup>nd</sup> Street, New York City, New York], and she may not re-enter the Real Property without prior written consent of the Trustee or an order of the Court obtained upon request, notice, and a hearing . . . .”

As of the filing of this letter, the Trustee’s representatives are present at the Real Property, and Ms. Kornish has not vacated the Real Property. Ms. Kornish’s refusal to leave the Real Property constitutes a violation of the Court’s Orders, including the *Order Granting Judgment*.

TOGUT, SEGAL & SEGAL LLP

Honorable Shelley C. Chapman  
United States Bankruptcy Court  
September 29, 2017  
Page 2

The *Order Granting Judgment* expressly and unambiguously provides for the consequence of Ms. Kornish's failure to timely vacate the Real Property:

in the event that Kornish fails to comply with this Judgment, the Trustee shall file a letter on the docket of this case and in the Adversary Proceeding, informing the Court of such alleged failure to comply, and the United States Marshals Service is instructed to use the minimum force necessary to remove Kornish from the Real Property, and the Trustee will be authorized to change the locks and otherwise secure the Real Property . . . .

Consequently, the Trustee respectfully requests that the United States Marshals Service immediately remove Ms. Kornish from the Real Property to enable the Trustee to change the locks and otherwise secure the Real Property.

Respectfully Submitted,

TOGUT, SEGAL & SEGAL LLP

By:

/s/ Neil Berger  
Neil Berger

NB/lv

Enclosures

cc: Albert Togut, Esq.  
Ms. Doris Kornish (via email)  
Andrew Velez-Rivera, Esq. (via email)  
Notice of Appearance Parties (via ECF)